

**Justification for Non-Substantive Changes to Form SSA-7104
Partnership Questionnaire
20 CFR, Subpart K, 404.1080-404.1082(e)
OMB No. 0960-0025**

Background

Generally, SSA provides the paper Form SSA-7104 to claimants to collect information on partnership income for use in determining several aspects of eligibility for benefits, including accuracy of reported partnership earnings, the veracity of a retirement, and lag earnings where SSA needs this information to determine the status of the insured. Additionally, SSA provides a PDF version of the SSA-7104 on our website for the public to print, complete, and submit to SSA for processing. At this time, claimants must print the blank PDF and fill it out using pen & ink, or they need to use a typewriter to complete the form. As some handwriting is difficult to read, or illegible, these non-fillable versions of the form are inefficient and ineffective since SSA employees who cannot read the submitted form must re-contact the respondent prior to processing. In addition, the use of typewriters has decreased significantly, as other tools, such as personal computing devices, have increased in use.

SSA developed a fillable, printable version of the SSA-7104, as some individuals may find it easier to use. The fillable version allows the respondents to complete the form electronically using a personal computer, or other computing device, print the completed form, and submit it to SSA. We developed this fillable version, as we want to ensure SSA provides effective communication and remains in compliance with the requirements of 45 CFR 85.51 of the Code of Federal Regulations and section 504 of the Rehabilitation Act of 1973. We propose the fillable PDF version as a more accessible modality. In addition, the new fillable modality will enhance our electronic services and recordkeeping efforts.

Revisions to the Information Collection

- ***Change #1:*** SSA intends to provide Form SSA-7104 in a fillable PDF file on our website, in place of the non-fillable PDF version we currently provide. We propose to make all form entries fillable.

Justification #1: This change will allow the respondents to continue to print and complete the form by hand, or, alternatively, complete the form using a computing device, such as a personal computer or handheld (mobile) device, and to print and submit it to SSA for processing.

After OMB approves the addition of the new fillable version of the form, SSA will phase out the standard PDF versions from our Internet and Intranet websites and replace them with the fillable PDF file.

- ***Change #2:*** We moved the updated Privacy Act Statement and the Paperwork Reduction Act Statement (which previously received OMB approval) from the beginning of the form to the end of the form to resolve spacing issues.

Justification #2: This change improves readability for the users of this form.

- **Change #3:** For readability, we made adjustments to prior lines and arrows that appeared on the form.

Justification #3: We eliminated all of the arrows and adjusted lines to give the form a cleaner appearance and to make it easier to follow.

- **Change #4:** We updated the attestation language at the bottom of page two to reflect approved language from the Office of the General Counsel.

Justification #4: By updating the attestation language with the most recent approved version, we are ensuring compliance and consistency.

These actions do not affect the public reporting burden.